

JP:MPR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

COMPLAINT
(T. 21, U.S.C., § 952)

YUDISTIR MAHARAJ,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL MARTINEZ, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about March 20, 2014, within the Eastern District of New York and elsewhere, the defendant YUDISTIR MAHARAJ, did knowingly and intentionally attempt to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 952(a).

(Title 21, United States Code, Section 952)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about March 20, 2014, the defendant YUDISTIR MAHARAJ, a citizen of the Republic of Trinidad and Tobago, arrived at JFK Airport aboard Caribbean Airlines flight no. 520 from Port of Spain. United States Customs and Border Protection ("CBP") Officers selected the defendant YUDISTIR MAHARAJ for an enforcement exam. The defendant YUDISTIR MAHARAJ presented a checked-in large black suitcase and a laptop bag for inspection. The defendant YUDISTIR MAHARAJ stated that he owned the suitcase and the bag.

2. Upon examination, the CBP Officer found three packages in the suitcase, which the defendant YUDISTIR MAHARAJ claimed, in sum and substance, contained frozen cooked goat meat. The three packages were X-rayed revealing a square like object inside of each one. The CBP Officer then escorted the defendant to a private room to continue the search.

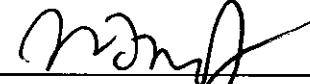
3. In the private room, the CBP Officer drilled into the packages and discovered a powdery white substance. The white substance field tested positive for the presence of cocaine. A gross total of 3,335.2 grams of cocaine was seized from food containers found in the defendant YUDISTIR MAHARAJ's luggage.

4. The CBP officer placed the defendant YUDISTIR MAHARAJ under arrest. HSI officers responded to the scene, and read the defendant YUDISTIR MAHARAJ

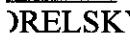
¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

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his Miranda rights, which he agreed to waive. The defendant YUDISTIR MAHARAJ then stated, in sum and substance, that he did not know the narcotics were contained in his suitcase.

WHEREFORE, your deponent respectfully requests that the defendant YUDISTIR MAHARAJ be dealt with according to law.


MICHAEL MARTINEZ
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
20th day of March, 2014


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